

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS**

SONIA CHAITLALL,

Plaintiff/Petitioner,

- against -

Index No. 718635/2021

RYDER TRUCK RENTAL and DANIEL PRINCE

Defendant/Respondent.

**NOTICE OF ELECTRONIC FILING
(Mandatory Case)
(Uniform Rule § 202.5-bb)**

You have received this Notice because:

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

• If you are represented by an attorney:

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

• If you are not represented by an attorney:

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.

The benefits of participating in e-filing include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

To register for e-filing or for more information about how e-filing works:

- visit: www.nycourts.gov/efile-unrepresented or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at www.nycourts.gov

To find legal information to help you represent yourself visit www.nycourthelp.gov

**Information for Attorneys
(E-filing is Mandatory for Attorneys)**

An attorney representing a party who is served with this notice must either:

- 1) immediately record his or her representation within the e-filed matter on the NYSCEF site www.nycourts.gov/efile; or
- 2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at www.nycourts.gov/efile or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: nyscef@nycourts.gov).

Dated: August 18, 2021 +

Paul Ajlouny

Name
Paul Ajlouny & Associates, P.C.

Firm Name

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Garden City, New York 11530

Address

(516) 535-5555

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To: See attached Rider

2/24/20

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

SONIA CHAITLALL,

=X

SUMMONS

Plaintiff,

-against-

RYDER TRUCK RENTAL and DANIEL PRINCE,

Defendants.

=X

Plaintiff designates Queens County as the place of trial based on the location of the accident.

To the above-named Defendant(s):

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance on the Plaintiff's Attorneys within 20 days after the service of this Summons, exclusive of the day of service (or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York). In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: August 18, 2021
Garden City, New York



Paul Ajlouny & Associates, P.C.
By: Paul Ajlouny, Esq.
320 Old Country Road, Suite 205
Garden City, New York 11530
P: (516) 535-5555

Defendants' Addresses:

RYDER TRUCK RENTAL
3100 Industrial Parkway
Jeffersonville, IN 47130

DANIEL PRINCE
3241 Vesta Lane
Harrisburg, PA 17110

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

SONIA CHAITLALL,

VERIFIED COMPLAINT

Plaintiff,

-against-

RYDER TRUCK RENTAL and DANIEL PRINCE,

Defendants.

Plaintiff alleges the following, upon information and belief:

1. The accident occurred in the County of Queens, State of New York.
2. At all relevant times, Defendant, RYDER TRUCK RENTAL, was a domestic business corporation licensed to do business in the State of New York.
3. At all relevant times, Defendant, RYDER TRUCK RENTAL, owned a motor vehicle bearing Indiana plate number 2868445, or similar number ("Vehicle 1").
4. At all relevant times, Defendant, DANIEL PRINCE, operated Vehicle 1 with the permission and consent of its owner.
5. At all relevant times, Defendant, DANIEL PRINCE, was employed by Defendant, RYDER TRUCK RENTAL.
6. At all relevant times, Defendant, DANIEL PRINCE, operated Vehicle 1 within the course of the aforementioned employment.
7. At all relevant times, Defendant, RYDER TRUCK RENTAL, was the lessee of Vehicle 1.
8. At all relevant times, Defendant, RYDER TRUCK RENTAL, was the lessor of Vehicle 1.

9. At all relevant times, Plaintiff operated a motor vehicle bearing Florida plate number 167DG, or similar number ("Vehicle 2").

10. At all relevant times, Van Wyck Expressway at or near its intersection with Linden Boulevard, in the County of Queens, State of New York, was a public roadway.

11. On or about July 12, 2019, at or near the aforementioned place, the aforementioned motor vehicles came into contact with each other.

12. At or about the aforesaid place, Vehicle 1 struck Vehicle 2.

13. At all relevant times, Defendants were negligent with regard to the ownership and operation of their aforementioned vehicle.

14. Solely by reason of the aforementioned negligence, Plaintiff sustained a serious injury and/or economic loss greater than the basic economic loss as defined by the New York Insurance Law.

15. This action falls within one or more of the exceptions contained in Article 16 of the CPLR.

16. Plaintiff's damages exceed the jurisdictional limits of all lower courts.

WHEREFORE, Plaintiff demands judgment in an amount to be determined at trial with costs and disbursements.

Dated: August 18, 2021
Garden City, New York



Paul Ajlouny & Associates, P.C.
By: Paul Ajlouny, Esq.
320 Old Country Road, Suite 205
Garden City, New York 11530
P: (516) 535-5555

ATTORNEY'S VERIFICATION

I have read the annexed Summons and Complaint and know the contents thereof, and the same are true to my knowledge, except for those matters therein stated upon information and belief, and as to those matters, I believe them to be true. The reason I make this verification instead of the Plaintiff herein is that said Plaintiff does not reside in the County where I maintain my office.

Dated: August 18, 2021
Garden City, New York



Paul Ajlouny, Esq.